

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

DWIGHT RUSSELL, et al.

On behalf of themselves and all  
others similarly situated,

Plaintiffs,

V.

HARRIS COUNTY, TEXAS, et al.

Defendants.

Case No. 4:19-cv-00226  
(Class Action)

**PLAINTIFFS' NOTICE OF DEPOSITION OF [NAME]**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned action will take the oral deposition of **NAME** on **DATE**.

Given the current level of disruption to the working schedules of parties and counsel located in Texas, including this District, as well as to parties and counsel located throughout the country and internationally laboring under similar COVID-19 public health restrictions, the deposition will occur virtually by video conference and that all parties, including the deponent, may appear remotely. The logistics pertaining to the video conferencing capabilities will be negotiated and resolved between the parties prior to the deposition.

PLEASE TAKE FURTHER NOTICE that the deposition testimony will be nonetheless recorded stenographically by a court reporter, with capacity to provide instant visual display of

the testimony such as by LiveNote, and will be videotaped. The deposition will be conducted under oath by an officer authorized to take such testimony and administer oaths and will continue from day to day until completed, with weekends or holidays excepted.

Dated: DATE

Respectfully submitted,

s/ Neal S. Manne

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**CERTIFICATE OF SERVICE**

I certify that on July X 2020, I caused the aforementioned document to be served electronically on liaison counsel for defendants as listed below:

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